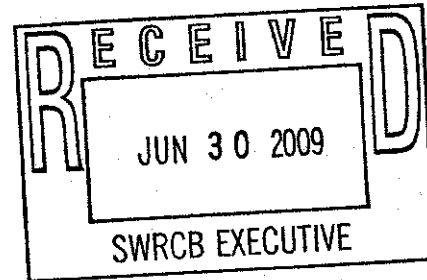


From: "Dan Gallagher" <gallagher@dsrds.com>
To: <commentletters@waterboards.ca.gov>
CC: "Bert Michalczyk" <michalczyk@dsrds.com>, "Dave Requa" <requa@dsrds.com>...
Date: 6/30/2009 11:53 AM
Subject: Comments on the Proposed General Permit for the Use of Recycled Water

State Water Resources Control Board;

In general, we feel that the revised General Permit contains far too many requirements for both users and administrators. Because of this, the general permit will impede the use of recycled water rather than encourage its use. The existing Bay Area RWQCB General Water Reuse Order 96-011 is much easier to apply, use, and enforce. Will this Revised General Permit replace or eliminate 96-011? If this Revised General Order is adopted, will agencies be required to file another NOI (Notice of Intent) for their recycled water programs?



A detailed listing of our comments is as follows:

- * This permit is only for landscape irrigation using recycled water. The permit does not address the other common uses of recycled water such as toilets, urinals, dust control, soil compaction, cooling towers, decorative fountains, sewer siphons, sewer cleaning, fire fighting, commercial car washes, cleaning areas such as roads, sidewalks, outdoor work areas, and the outside of buildings, and irrigating food crops. Will the RWQCB be required to issue individual permits for all of these uses?
- * This permit is limited to disinfected tertiary recycled water, and does not address secondary treated recycled water.
- * On page 14 of 22 #9, the Revised General Order requires a separation between recycled water and domestic water, but the Revised General Order does not mention a separation from sewer. What about irrigation lines?
- * On #12, page 14 of 22, the Revised General Order requires signs to be put on all areas of public access and the perimeter in which the recycled water is used. This will not be cost effective, and signs should be at the entrance only.
- * On page 13 of 22, #7 in which the Revised General Order states "the direct or indirect discharge from use areas of recycled water to surface waters, either perennial or ephemeral, including wetlands, vernal pools, etc. is prohibited, unless otherwise authorized by an NPDES permit." What about ponds and water features on golf courses, which are commonly filled with recycled water and often used for irrigation storage?
- * On same page, #10, in which the Revised General Order states "use of any equipment or facilities that have been used to convey recycled water also used for potable water conveyance, is prohibited." What about fire trucks? At a minimum the Revised General Order should allow this but require treatment prior to subsequent use for domestic water.
- * On page 14 #6, which states "use areas that are spray irrigated and allow public access shall be irrigated during periods of minimal use. Consideration shall be given to allow maximum drying time prior to subsequent public use." Due to budget limitations and labor shortages many schools have requested extended hours to complete their irrigation cycles, which the Revised General Order appears to discourage even if application sites are supervised.
- * On page 14 of 22, #11, what type of locking device does the Revised General Order require?
- * On page 15 of 22, #14, The Revised General Order reads "recycled water shall be managed to avoid contact with workers." The Revised General Order should be written to "minimize contact with workers and the public.

* On page 17 of 22, #5 a, requires an Operations Plan. What is entailed in this Plan? Is it intended to replace CDPH's Recycled Water Use Guidelines?

* On the same page #5b, we object to this requirement because water quality is already poor in the fringe basin, and the Revised General Order makes it difficult for agencies to use recycled water. With language like this the Revised General Order is an impediment, and not an encouragement.

* On page 18 of 22, f, if the Revised General Order requires one-time training for supervisors, how about the laborers that do the work in the field?

* On page 21 of 22 #18, this provision will be hard to enforce. For user reporting, how does the Revised General Order propose to regulate nutritive loading via salinity application rate and nitrogen application rate? How will users determine the volume of water applied in acre-feet per month when the readings are done bi-monthly for the billing cycle?

* The permit states that the "administrator" will ensure periodic inspections are done at least quarterly. Who is the administrator in multi-agency cooperatives where one agency produces the recycled water but several agencies distribute the recycled water to customers?

* The permit also states that the administrator shall report non-compliance that may endanger health or environment. Again, what about multi-agency cooperatives where one agency produces the recycled water but several agencies distribute the recycled water to customers?

* On page C-1 of C-4 (BMP's), I A. in which the Revised General Order states "implementation of Operations and Management that provides for detection of leaks, and correction either within 72 hours of learning of a leak, or prior to the release of 1,000 gallons." Who does this BMP apply to? Does this BMP pertain to users (i.e. customers and/or site supervisors)?

Please feel free to call if you have any questions.

Dan Gallagher

Operations Manager

Dublin San Ramon Services District

7399 Johnson Drive

Pleasanton, CA 94588

(925) 875-2345 Office

(925) 570-8759 Cell

(925) 462-0658 Fax